



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

July 29, 2021

Brian Conners
Operations Lead, East
Chevron Environmental Management Company
1200 State Street
Perth Amboy, New Jersey 08861

Re: Catalyst Bead Site Investigation Work Plan for SWMU's 39 and 40, dated June 22, 2021
Former Chevron Perth Amboy Facility
Perth Amboy, Middlesex County, New Jersey
EPA ID #: NJD081982902

Dear Mr. Conners:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Catalyst Bead Site Investigation Work Plan for SWMU's 39 and 40, dated June 22, 2021, for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. Catalyst beads were identified in a March 24, 2020 letter, where Chevron requested no further action for PCBs due to the facility's claim that PCBs were not used in the refining process. Given the lack of confirmed samples, we requested additional sampling during the May 20, 2021 conference call to confirm the non-existence of PCBs in catalyst beads. This report was submitted by Chevron Environmental Management Company to EPA pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E.

We conditionally approve the work plan, pending Chevron's acknowledgement of the following comments:

1. Figure 4 of the Catalyst Beads site investigation work plan shows that significant amounts of catalyst beads were identified in distinct layers at SWMU 7, SWMU 19, SWMU 39, SWMU 40, and SWMU 43 in the Main Yard of the facility. We request that Chevron take at least one additional boring in each of the other two SWMUs (SWMU 7 and SWMU 9) to better characterize the catalyst beads in the Main Yard. We acknowledge that sampling at SWMU 43 would require compromising the installed cap and therefore sampling will not be feasible. However, if PCB is determined to be associated with catalyst beads in any of the other SWMUs, the path forward on SWMU 43 will be revisited.
2. Chevron will need to submit an updated QAPP to include PCBs.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at vargas.ricardito@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Ricardo Vargas", is positioned below the "Sincerely," text.

Ricardito Vargas
Project Manager
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)